



May 1, 2015

KENNETH L. MICKENS, ESQUIRE LLC
LEGAL CONSULTING

E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

**Re: PPL Electric Utilities Corporation
Base Rate Proceeding
Docket No. R-2015-2469275 - Petition to Intervene
of the Sustainable Energy Fund**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of the Sustainable Energy Fund ("SEF") in the above-captioned proceeding. I have also enclosed the Affidavit of John M. Costlow, the President of SEF. Copies have been served today on all known parties to this proceeding. A Certificate of Service is attached. Please contact me if you have any questions.

Sincerely,

Kenneth L. Mickens, Esquire
Attorney for the Sustainable
Energy Fund

KLM/bls
Certificate of Service
Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation :
Distribution Rate Increase Request : **Docket No. R-2015-2469275**
:

**PETITION TO INTERVENE OF
THE SUSTAINABLE ENERGY FUND**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

The Sustainable Energy Fund (“SEF”), by and through its attorney, Kenneth L. Mickens, hereby files this Petition to Intervene in the above-captioned proceeding pursuant to 52 Pa. Code § 5.71, *et. seq.* In support of its intervention, SEF avers as follows:

I. BACKGROUND

1. On March 31, 2015, PPL Electric Utilities Corporation (“PPL Electric” or “Company”) filed with the Pennsylvania Public Utility Commission (“Commission”) a request for approval of an overall annual increase in distribution revenues of approximately \$167.5 million based on a future test year ending December 31, 2015, and a proposed allowed rate of return on equity of 10.95 percent. If granted by the Commission as filed,

this request would produce a system average increase in distribution rates of approximately 18.5 percent and an increase in total rates (distribution, transmission and generation charges) of approximately 3.9 percent for default service customers.¹

2. In this filing, PPL Electric is proposing to continue movement toward distribution rates that are demand and customer based and less usage based. Specifically, the Company states that this change results in rates that “are more reflective of how costs are incurred by an electric distribution company.”²

3. SEF is a Pennsylvania corporation established at the conclusion of PPL Electric’s Restructuring proceeding and pursuant to the terms of the Joint Settlement of that proceeding, approved by the Commission’s August 27, 1998 Order at Docket No. R-00973954. SEF’s mission is to promote and invest in energy efficiency, energy conservation, renewable energy and energy education in order to provide opportunities and benefits for PPL Electric ratepayers.

4. SEF’s address is as follows:

The Sustainable Energy Fund of Central Eastern Pennsylvania
1005 Brookside Road, Suite 210
Allentown, PA 18106

¹ PPL Electric Cover Letter dated March 31, 2015.

² PPL Electric St. 5, p. 12 (Direct Testimony of Scott R. Koch).

5. The name, address and telephone number of SEF's attorney are:

Kenneth L. Mickens, Esq.
PA Attorney I.D. #31255
316 Yorkshire Drive
Harrisburg, PA 17111
kmickens11@verizon.net (e-mail)
(717) 343-3338 (Telephone)
(717) 657-0938 (FAX)

II. SEF's INTEREST IN THE PROCEEDING

6. SEF's mission, as mentioned above, is to promote and invest in energy efficiency, energy conservation, renewable energy and energy education that provide opportunities and benefits for PPL Electric customers. In furtherance of its mission, SEF is engaged in projects that emphasize renewable energy sources, such as solar and wind power development, clean energy technologies, energy conservation and efficiency, as well as energy education. In this regard, SEF has been certified as a Conservation Services Provider.

7. SEF's mission, in large part, is focused on reductions in consumption and demand for the non-renewable, non-sustainable production of electricity within the PPL Electric service territory. As such, this mission coincides with the Company's stated efforts in this distribution rate increase proceeding to move towards distribution rates that are more demand and customer dependent and less energy dependent. Specifically,

SEF is interested in how the Company's proposed rate increase will impact energy efficiency and renewable energy projects. SEF is also concerned about the Company's proposed modification to the Net Metering for Customer-Generators Rider and its impact on energy efficiency and renewable energy projects.

8. Accordingly, SEF's intervention is necessary to ensure the development of a complete record on the reasonableness of the proposed distribution rate increase request. SEF has a unique perspective, in keeping with its mission to promote and invest in energy efficiency, energy conservation, renewable energy and energy education that provide opportunities and benefits for PPL Electric ratepayers that cannot be represented by any other party to this proceeding. SEF submits that this unique interest coincides with the public interest and should be considered by the Commission.

9. Moreover, SEF has experience and expertise in matters of energy efficiency, energy conservation and consumer education such that its participation in this proceeding would benefit the record.

10. SEF intends to actively participate in this proceeding.

WHEREFORE, for the reasons discussed herein, the Sustainable Energy Fund of Central Eastern Pennsylvania requests that the Pennsylvania

Public Utility Commission grant its Petition to Intervene in the above-captioned proceeding and grant it full party status.

Respectfully submitted,



Kenneth L. Mickens, Esq.

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Attorney for The Sustainable Energy
Fund of Central Eastern Pennsylvania

DATED: May 1, 2015

AFFIDAVIT

I, John M. Costlow, certify that I am the President of the Sustainable Energy Fund of Central Eastern Pennsylvania and that, in said capacity, I am authorized to and do make this Affidavit for it, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief and that I expect the Sustainable Energy Fund of Central Eastern Pennsylvania to be able to prove the same at any hearing hereof. I understand that false statements made herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsifications to authorities.



John M. Costlow, President
Sustainable Energy Fund of
Central Eastern Pennsylvania

DATED: April 28, 2015

CERTIFICATE OF SERVICE

Docket No. R-2015-2469275

I hereby certify that I have this day served a copy of the foregoing SEF Petition to Intervene upon the following persons via e-mail and first class mail in accordance with the requirements of 52 Pa. Code § 1.54 et seq.

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Honorable Susan D. Colwell
Administrative Law Judge
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Dated: May 1, 2015